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## EXHIBIT B

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13	Lively v. Baldoni
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Page 2 1 HARVEY LEVIN: Okay. Now we have 2 Justin Baldon's attorney on, Bryan Freedman. 3 Bryan, welcome. BRYAN FREEDMAN: How are you, Harvey? 5 HARVEY LEVIN: I'm good. So can I 6 throw this out? Because I have a feeling you are 7 going to be angry, but I'm just going to in full 8 disclosure tell you what I said and I believe 9 what Mark said. I don't think this case is ever 10 going to trial. I think you've kind of won the 11 PR battle and I feel like this case was filed for 12 PR reasons more than legal reasons. And you won 13 it. Nobody wants to sit for depos, nobody wants 14 to go on the stand. I don't see this case ever 15 going to trial. MARK GERAGOS: And to be fair, what I 16 17 said is if I'm representing Blake Lively, I am 18 going to do virtually anything to not let Bryan 19 Freedman depose my client. BRYAN FREEDMAN: You know what? I'm 21 not really sure whether it's going to go to trial 22 or not go to trial, but I just know one thing. 23 Justin is a -- really, he's a great guy. I wish

1 settled at this point? BRYAN FREEDMAN: I think what hasn't 3 been settled is the fact that he's -- you know, 4 they've lost four projects, significant projects, 5 the studio. There's obviously the reputational 6 and emotional distress harm. He's got two little 7 kids that, you know, pay attention to what goes 8 on in the world. His wife is devastated. And, 9 you know, and there's others involved in this too 10 that have lost significant business and personal 11 relationships. MARK GERAGOS: I've said it a million 12 13 times, you've raised the Titanic in this case. 14 Because but for Bryan Freedman, Justin Baldoni 15 would have been crushed in this matter. And 16 that's where it was headed. And it was headed 17 for him to be crushed. 18 When you see the kinds of things that 19 were left on the cutting room floor, literally, 20 in that New York Times articles, it's 21 infuriating. 22 HARVEY LEVIN: But that's against the 23 New York Times. And I get that, and that is kind 24 of separate. 25 I guess what I'm wondering is if Blake

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1 HARVEY LEVIN: Don't you feel like

2 you've won this PR war now?

3 BRYAN FREEDMAN: It's not even about

4 winning a PR war. It's -- honestly, it's about

5 saving someone's life. I mean, imagine, Harvey,

6 imagine you being accused of something that you

7 just didn't do, you just weren't part of. And

8 you're caught up in this and you're a real,

9 decent human being. And this is a powerful thing

10 that you're going through and your whole career

11 seems to have been gone and vanished before your

12 very eyes.

13 HARVEY LEVIN: I'm confused about that.

24 this was more about him and less about, you know,

25 negativity, frankly.

seems to have been gone and vanished before your very eyes.

HARVEY LEVIN: I'm confused about that. I know William Morris dropped Justin. But at the same time, more people know who this guy is than they did before this. And just in terms of the (indiscernible) Nielsens that I see just in terms of what comes at us here at TMZ, that Blake was winning at the beginning and it turned around and where with the beginning and it turned around and she's not now. So isn't it mission accomplished? Because, you know, I know you're suing for huge numbers. But especially your lawsuit against Blake, you know, I feel like her lawsuit was a PR -- to try and salvage PR and his was a reaction

25 to that. And hasn't that all kind of been

3 husband to take the stand. She doesn't want 4 Taylor Swift to take the stand, nor do they want 5 to take the stand. So if they came to you and just said we 7 will basically call this a massive 8 misunderstanding, can we just drop it, would you 9 entertain it? I'm curious. 10 BRYAN FREEDMAN: I mean, he was called 11 a sexual predator. So are they saying he's still 12 a sexual predator but it's a misunderstanding? 13 MARK GERAGOS: You know, Harvey, when 14 you're in the middle of representing one of these 15 people who is in the eye of the storm -- and 16 Bryan's done it a zillion times, I've done it a 17 fair amount of times -- you need to be 18 vindicated. Because at the end of the day you're 19 not -- you know, no amount of money will get you 20 back to square zero. 21 To your point, Harvey, as many people 22 didn't know Baldoni as they knew Lively. 23 However, Lively, be careful what you wish for,

24 the public has gone full Amber Heard on her. And

25 Baldoni could have been defined, as Bryan just

1 -- Bryan, Blake Lively, the last thing she wants

2 is to take the stand. She doesn't want her

2 (Pages 2 - 5)

Page 6 1 said, as the sexual predator but for the 1 I am looking forward to discovery because when 2 magnificent job he has done here. So there's a -2 you start to look into what was in Stephanie 3 - it's a horrible body blow to have to take and 3 Jones' hands and what was in Leslie Sloane's 4 have -- you know, can't leave your house. I 4 hands and what was in Blake Lively's text 5 don't know and I haven't asked you this, Bryan, 5 messages and what those discussions were like, I 6 but I assume he's got round-the-clock security 6 think we're going to find the answers to this 7 and his family has had to be relocated and the 7 really quickly. 8 whole bit. HARVEY LEVIN: You are going to depose BRYAN FREEDMAN: I mean, there's 9 Blake Lively, Ryan Reynolds, Taylor Swift. Who 10 certainly that invasion of privacy that goes on. 10 else? BRYAN FREEDMAN: Well, I don't know 11 But I think it's not so much having something to 11 12 do with me that turned the tide. I mean, the 12 that we're going to depose Taylor Swift or not. 13 reason to put the information out there is just 13 HARVEY LEVIN: Really? 14 because of who he is. It's the truth. It's just BRYAN FREEDMAN: You know, I think 14 15 the truth. And the reality is that, you know, 15 that's going to be probably a gametime decision. 16 had there been these horrible things and had 16 I don't know that that decision has been made. 17 But I can tell you this, there's -- you know, 17 there been these horrible text messages, had 18 there been this horrible information, you know, 18 anyone that reasonably has information that can 19 that stuff would have been put out there, too. 19 be -- that can provide evidence in this case is MARK GERAGOS: I appreciate your 20 going to be deposed. 21 humility, but you and I both know, and I think 21 HARVEY LEVIN: That's Taylor Swift. 22 Harvey would say the same, a lot of lawyers in 22 She was there for that meeting. 23 your position would have just rolled over and 23 BRYAN FREEDMAN: She was there for that 24 played dead. That's unfortunate. They would not 24 meeting. 25 have fought back and just would have thought 25 HARVEY LEVIN: Okay. Well, I am a Page 7 1 there's no way to stem this tide, it's a tsunami 1 lawyer. I know what that means. And that's why 2 coming at me. 2 I'm just thinking that even when you take Blake 3 and Ryan out of it in terms of how they HARVEY LEVIN: Yeah. So mark and I 4 were talking about something before you jumped

5 on. The whole thing is curious, the way Ryan

6 Reynolds got so involved in this. There was that 7 meeting at their penthouse where he confronted

8 Justin and allegedly screamed at Justin. And we

9 were talking about what brought all of this on.

10 Was it that Blake was going home and expressing

11 her dismay at things that were happening with him 12 or was this -- I mean, people are kind of talking

13 about this online. Kind of a love/hate kind of

14 thing where all of the sudden Ryan is just saying

15 just stop it, everybody. And I'm not saying that

16 happened, but people are talking that way. So

17 I'm just wondering what you think the motivation

18 was where this turned into nuclear war.

BRYAN FREEDMAN: Well, you know, as we 19 order the witness not to talk.

20 have alleged in our complaint that, you know,

21 this was a takeover of a movie. And, you know,

22 whether we find out exactly what the reasons for

23 the takeover were and who was behind the

24 takeover, I think we're going to find some

25 interesting documents when discovery starts. And

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- 4 personally feel about it all, I mean, to say that
- 5 we're going to make -- put Taylor Swift in the
- 6 middle of this whole thing, I think they are
- 7 going to do everything they can to avoid going to
- 8 court. Because the last thing they want is to
- 9 have their friend, the biggest star in the world
- 10 now, sitting on a stand being grilled by Bryan

11 Freedman.

12 BRYAN FREEDMAN: My assumption is that

13 they're going to probably take some legal actions

14 that are beyond the bounds of decency. And we'll

15 see if they can try to avoid a deposition.

16 HARVEY LEVIN: How could they do that 17 if there's relevance?

18 MARK GERAGOS: I'm going to object and

HARVEY LEVIN: You're not his lawyer. 20

21 You're his friend. Jeez.

2.2. BRYAN FREEDMAN: Mark is usually my

23 lawyer though.

24 HARVEY LEVIN: I'm working here, guys.

25 I mean, come on.

3 (Pages 6 - 9)

1 MARK GERAGOS: I know. You're working.
2 So am I. So am I.
3 Bryan, I have a question. And you

4 don't have to answer it if you think it skirts 5 it.

5 it.
6 We were talking early on that when
7 Judge Liman came out yesterday on the record -8 so I'm not trying to influence anybody or get
9 anybody sideways -- he had mentioned that he was
10 not inclined to order compliance with the New
11 York rule, but that because stipulation of the
12 parties, he had reconsidered. Do you want to
13 describe what that means? Because we took a

13 describe what that means? Because we took a
14 flyer and I want to make sure we got it right.
15 BRYAN FREEDMAN: Look, I think that

16 every lawyer intends to follow the professional 17 rules of conduct. And that's -- there's been

18 every intention to do that in this case, and we 19 believe we've followed the professional rules of

20 conduct. And the professional rule of conduct at

21 issue talks about an exception. And that

22 exception is when your client is prejudiced by

23 public information that's not generated by you

24 but in fact generated by a third party or the

25 other party. And all we're trying to do is have

3 tell you, I covered -- I have covered so many

\_\_\_\_\_\_I

HARVEY LEVIN: You know, I've got to

1 a fair process. That's all.

4 cases. The OJ Simpson case was my life for a
5 long, long time. And there was -- and Rodney
6 King was my life. And every day both sides tried
7 to prejudice the jury pool. And ultimately it
8 didn't matter. And that's what lawyers do
9 anyway. They're not there to say I'm just going
10 to be a straight shooter. They're advocates at
11 the idea that you can taint a jury by holding a

12 news conference and talking about a text. To me 13 it's so ridiculous. And you look at OJ Simpson

14 and, you know, I reported every day there was

15 blood going from the bodies to his bathroom and

16 he was acquitted.

17 So the idea that a jury is somehow 18 going to remember what Bryan Freedman or the

19 other side said a year before a trial to me is

20 just -- I think the rule is stupid. Both of you

21 guys represent a lot of famous people. And

22 trials are kind of two-pronged. One, you want to

23 win the case that's before you. But then you

24 want to make sure that the person's life is okay

25 once the trial is over and that they still have a

Page 10

Page 12 1 career and, you know, they can make money, they

2 can support their family. And that element is

3 what lawyers do outside the courtroom.

4 And so I always thought when judges 5 say, no, muzzle yourself, they're not allowing

6 you to fully represent a client.

BRYAN FREEDMAN: I don't think that's

8 what the judge is saying at all, muzzle yourself.

9 I think the judge is really saying, you know,

10 backed in accordance with, you know, professional

11 -- you know, the professional rules. And --

12 HARVEY LEVIN: But what does that mean?

13 What does that mean?

14 BRYAN FREEDMAN: I think that it means

15 that if there's prejudice to your client as a

16 result of something that you didn't cause that

17 was caused by someone else or something else,

18 that you are allowed to put forth evidence to

19 make sure that that prejudice is remedied.

20 HARVEY LEVIN: So how does Justin feel

21 now? Does he feel like there is kind of a move

22 toward understanding and believing him more? Is

23 he taking solace in that? Is he still, you know,

24 devastated? Are the -- is the entertainment

25 industry backing away from him? Have they come

Page 11

1 back? What's going on in his world?

2 BRYAN FREEDMAN: I think he feels

3 really concerned about all of this and really sad 4 about all of it for everybody that's involved. I

5 think he goes through, you know, emotions that

6 everyone goes through in these types of

7 situations. But, you know, he's a really decent

8 human being and a decent person and has really

9 been very fair and not wanting to attack anyone.

10 But he is devastated, as anyone would be.

11 And the studio has lost hundreds of 12 millions of dollars. And as we've put forth in

13 the complaint, there are significant damages that

14 he suffered. And the emotional distress having

15 represented a number of people who have been

16 involved in these situations, the emotional

17 distress that people go through and how difficult

18 it is to walk through an airport, to walk through

19 your daily life to be with your children, to try

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20 to be a normal father or husband and any of it

21 with all of this weighing on you is just

22 tremendously taxing. And he's going through it.

23 You know, like they all go through it. And we're

24 just -- you know, he's going to keep his head

25 held high and tell the truth and be honest and be

Page 13

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	honorable. And we know that that will serve hi	
2	HARVEY LEVIN: Bryan, thank you. Y	ou
3	are our first guest on our first 2 Angry Men	
4	podcast. So thanks for jumping on.	
5	BRYAN FREEDMAN: Okay. Well, I h	ope I
6	don't get sanctioned as a result of it. So	
	but I'm sure you guys will indemnify me. So	
	we'll be good.	
9	HARVEY LEVIN: What could go wron	g?
10	Thank you, Bryan.	
11	BRYAN FREEDMAN: All right. Take	care.
	Thank you.	
13	HARVEY LEVIN: Okay, Mark. We'll t	alk
	next week.	
15	MARK GERAGOS: Okay. Thank you.	
16	HARVEY LEVIN: Thanks, guys.	
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1	CERTIFICATION	
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	I, Sonya Ledanski Hyde, certify that the	
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